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7 Revocable Trust.

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9 **PINO & ASSOCIATES**  
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12 Attorneys for Dreyer Babich Buccola Wood Campora, LLP

13 THE UNITED STATES BANKRUPTCY COURT  
14 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA  
15 SAN FRANCISCO DIVISION

16 **In re:** ) Case Nos. 19-30088 (DM)  
17 **PG&E CORPORATION,** )  
18 **-and-** ) Chapter 11  
19 **In re:** )  
20 **PACIFIC GAS AND ELECTRIC** )  
21 **COMPANY,** )  
22 Debtors. )  
23  Affects PG&E Corporation )  
24  Affects Pacific Gas and Electric )  
25 Company )  
26  Affects both Debtors )  
27 \* All papers shall be filed in the lead case, No. )  
19-30088(DM) )  
28 )  
DATE: August 13, 2024  
TIME: 10:00 A.M.  
PLACE: Telephone/Videoconference  
<https://www.canb.uscourts.gov/calendars>  
JUDGE: Hon. Dennis Montali  
OBJECTION DEADLINE: **July 30, 2024**  
**(4:00 P.M. Prevailing Pacific Time)**

1 Dreyer Babich Buccola Wood Campora, LLP (“Dreyer Babich”), counsel of record<sup>1</sup> for:  
2 Monica Huchro and Monica Huchro as Trustee of the Monica Huchro Revocable Trust (collectively  
3 “Creditors”), by and through its attorneys of record, respectfully submits this Motion for Order  
4 Authorizing Withdrawal of Counsel to Monica Huchro and Monica Huchro as Trustee of the Monica  
5 Huchro Revocable Trust (the “Motion”).  
6

7 **EVIDENTIARY SUPPORT**

8 This Motion is supported by the Declaration of Steve Campora, which is filed concurrently  
9 herewith.  
10

11 **FACTUAL BACKGROUND**

12 1. On January 29, 2019, PG&E Corporation and Pacific Gas & Electric Company filed  
13 petitions for relief under Chapter 11 of Title 11 of the United States Code with the United States  
14 Bankruptcy Court, in and for the Northern District of California (the “Court”), commencing case  
15 numbers 2019-30088 (DM) and 2019-30089 (DM) (collectively the “Bankruptcy Cases”).  
16

17 *Declaration of Steve Campora, ¶4.*

18 2. The Court set a Claims Bar Date for October 21, 2019, which was later extended up  
19 to and including December 31, 2019.

20 3. Dreyer Babich was retained by Creditors to represent them in the Bankruptcy Cases.

21 4. On October 2, 2019, Dreyer Babich timely filed two (2) separate Proofs of Claim in  
22 the Bankruptcy Cases on behalf of Creditors, which were assigned claim number 34845 and 34923  
23 (collectively the “Proofs of Claim”), seeking damages on behalf of Creditors from the Camp Fire.

25 *Declaration of Steve Campora, ¶5.*

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28 <sup>1</sup> Dreyer Babich retained Pino & Associates to, among other things, assist it in filing this motion. Pino & Associates  
has no contractual or attorney/client relationship with Creditors.

1       5.     Since the filing of the Proofs of Claim, irreconcilable differences have developed  
2 between Creditors and Dreyer Babich to such an extent that the attorney-client relationship has  
3 broken down and is no longer sustainable. *Declaration of Steve Campora*, ¶6.  
4

5       6.     Based on these circumstances, good cause exists for the Court to enter an order  
6 relieving Dreyer Babich as counsel for Creditors and excusing Dreyer Babich from transmitting  
7 documents filed in the Bankruptcy Cases relating to the Proofs of Claim to the Creditors.  
8

## **ARGUMENT**

9       Pursuant to Civil L.R. 11-5, entitled “Withdrawal from Case,” which is in force in the  
10 Northern District of California and is made applicable to these Bankruptcy Cases pursuant to B.L.R.  
11 1001-2(a), entitled “**Incorporation of Civil Local Rules**” (emphasis found in original):  
12

13       [c]ounsel may not withdraw from an action until relieved by order of the Court after written  
14 notice has been provided, reasonably in advance, to the client and to all other parties who  
15 have appeared in the case.

16       The Standing Committee on Professional Responsibility and Conduct of the State Bar of  
17 California has opined that “. . . , for purposes of the motion to withdraw, it will be sufficient to state  
18 words to the effect that ethical considerations require withdrawal or that there has been an  
19 irreconcilable breakdown in the attorney-client relationship.” Formal Opinion No. 2015-192.

20       In this case, after the filing of the Proofs of Claim, an irreconcilable breakdown of the  
21 attorney-client relationship between Creditors and Dreyer Babich has occurred. *Declaration of*  
22 *Steve Campora*, ¶6. This constitutes good cause for the Court to grant leave for Dreyer Babich to  
23 withdraw as counsel of record for Creditors.  
24

25       To the extent that Creditors request that Dreyer Babich turn over any files or information to  
26 which they are entitled, Dreyer Babich will cooperate and transmit such files. *Declaration of Steve*  
27 *Campora*, ¶8.  
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Upon granting of the Motion, Dreyer Babich will provide notice to the Trustee of the Fire Victim Trust (the “Trustee”) established for the claims arising out of the Camp Fire, so that the Creditors may be given access to their entire file with the Trustee. *Declaration of Steve Campora,* ¶9.

## **CONCLUSION**

For the reasons set forth herein, it is respectfully requested that the Court enter an Order:

1.     Granting the Motion; and
2.     Authorizing Dreyer Babich to withdraw as counsel for record for Creditors; and
3.     Authorizing Dreyer Babich to provide actual notice of its withdrawal as counsel for  
Creditors to the Trustee; and
4.     Excusing Dreyer Babich from transmitting documents filed in the Bankruptcy Cases,

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1       5. Directing all parties, including the Trustee, in the Bankruptcy Cases to transmit all  
2 appropriate notices and pleadings directly to the Creditors at the following addresses:  
3

4 <b>Monica Huchro</b> 5       6224 Harvey Road 6       Paradise, CA 95969	6 <b>Monica Huchro as Trustee of the</b> 7 <b>Monica Huchro Revocable Trust</b> 8       6224 Harvey Road 9       Paradise, CA 95969
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10      6. For such further relief as is fair, just, and equitable, whether or not specifically  
11     requested herein.

12     Respectfully submitted,

13     Dated: July 16, 2024

14     Dated: July 16, 2024

15     **DREYER BABICH BUCCOLA WOOD**  
16     **CAMPORA, LLP**

17     **PINO & ASSOCIATES**

18     By:   
19     Steve Campora, Counsel for  
20     Creditors, Monica Huchro and Monica  
21     Huchro as Trustee of the Monica Huchro  
22     Revocable Trust

23     By: /s/ Estela O. Pino  
24     Estela O. Pino, Counsel for  
25     Dreyer Babich Buccola  
26     Wood Campora, LLP